

# Exhibit 531

## CERTIFIED TRANSLATION

Message

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**From:** PFI002@politi.dk[PFI002@politi.dk]  
**Sent:** 4/25/2019 2:58:39PM  
**To:** GryAhlefeld-Engel[gry.ahlefeld-engel@sktst.dk]  
**Subject:** RE: RE: Settlement

Yep. I'm free from 2:00 to 4:00 in the afternoon.

-----Original message-----

From: Gry Ahlefeld-Engel[mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: Thu, 25 Apr 2019 15:52:14 +0000  
To: Fiig, Per (PFI002)  
Subject: RE: RE: Settlement

Monday afternoon?

Best regards

Gry Ahlefeld-Engel  
Deputy Director  
Complex Fraud

+45 72 37 36 62  
Gry.AhlefeldEngel@SKTST.DK

The Danish Tax Agency  
Kratbjerg 236, Fredensborg  
www.sktst.dk

The Danish Tax Agency is part of the Danish Tax Administration

-----Original message-----

From: PFI002@politi.dk[mailto:PFI002@politi.dk]  
Sent: Thu, 25 Apr 2019 13:00:01 +0000  
To: Gry Ahlefeld-Engel<Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: RE: Settlement

Better Wednesday morning between 8 and 11.30 AM?

-----Original message-----

From: Gry Ahlefeld-Engel[mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: Thu, 25 Apr 2019 12:59:08 +0000  
To: Fiig, Per (PFI002)  
Subject: Re: RE: Settlement

I have talks Tuesday morning. Can you do late in the afternoon?

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From: PFI002@politi.dk<PFI002@politi.dk>  
Date: 4/25/2019 12:34:54 PM  
To: Gry Ahlefeld-Engel<Gry.Ahlefeld-Engel@SKTST.DK>  
Subject: RE: Settlement

Dear Gry

Lack of clarification about IOI blocks the process from going forward, see Høpner. Can you put a little pressure on KA?

Morten has no need to attend a meeting, so it is probably only me, since Niels is out. What do you say to Tuesday at 10 AM?

Best regards  
Per

From: Gry Ahlefeld-Engel[mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sent: 24 April 2019 21:44  
To: Fiig, Per (PFI002)  
Subject: Settlement

Dear Per,

Our settlement negotiations have picked up again and I will likely be going to NYC in week 20 for a final negotiation meeting. There will likely be a need at the negotiation meeting for us to give a nod to the settlement agreement text subject only to final formal approval and signature in DK. I think, based on that, that there is a need for us to meet next week so that we are completely aligned between our authorities with respect to the terms of the agreement.

How does that look for you guys. Steen and I can both rearrange a bit around Monday, Tuesday and Wednesday afternoon next week?

//Gry (it seems it might have nice better to write 'elements' somewhere in the above. The text kind of calls for it.)

Best regards

Gry Ahlefeldt-Engel  
Director  
Antifraud Unit

+45 72 37 36 62

Gry.Ahlefeldt-Engel@SKTST.DK<mailto:Gry.Ahlefeldt-Engel@SKTST.DK>

[cid:image001.jpg@01D4FB62.401A9E00]<www.sktst.dk>

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Message

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**From:** PFI002@politi.dk [PFI002@politi.dk]  
**Sent:** 4/25/2019 2:58:39 PM  
**To:** Gry Ahlefeld-Engel [gry.ahlefeld-engel@sktst.dk]  
**Subject:** SV: SV: Forlig

Jep. Jeg er ledig 14-16

-----Oprindelig meddelelse-----

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sendt: 25. april 2019 15:52  
Til: Fiig, Per (PFI002)  
Emne: SV: SV: Forlig

Mandag eftermiddag?

Venlig hilsen

Gry Ahlefeld-Engel  
Underdirektør  
Kompleks Svig

+45 72 37 36 62  
Gry.Ahlefeld-Engel@SKTST.DK

Skattestyrelsen  
Kratbjerg 236, Fredensborg  
www.sktst.dk

Skattestyrelsen er en del af Skatteforvaltningen

-----Oprindelig meddelelse-----

Fra: PFI002@politi.dk [mailto:PFI002@politi.dk]  
Sendt: 25. april 2019 13:00  
Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Emne: SV: SV: Forlig

Bedre onsdag formiddag mellem 8 og 11.30?

-----Oprindelig meddelelse-----

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sendt: 25. april 2019 12:59  
Til: Fiig, Per (PFI002)  
Emne: Ang: SV: Forlig

Jeg har samtaler tirsdag formiddag. Kan du sidst på eftermiddagen?

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Fra: PFI002@politi.dk <PFI002@politi.dk>  
Dato: 25. april 2019 kl. 12.34.54 CEST  
Til: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>  
Emne: SV: Forlig

Kære Gry

Manglende afklaring om LOI blokerer for den videre proces, jf. Høpner. Kan du presse lidt på hos KA?

Morten har ikke behov for at deltage i et møde, så det er sikkert kun mig, da Niels er ude. Hvad siger I til tirsdag kl. 10?

Bedste hilsner  
Per

Fra: Gry Ahlefeld-Engel [mailto:Gry.Ahlefeld-Engel@SKTST.DK]  
Sendt: 24. april 2019 21:44  
Til: Fiig, Per (PFI002)  
Emne: Forlig

Kære Per,

Vores forligsforhandlinger har taget fart igen, og jeg skal formentlig til NYC i uge 20 til et afsluttende forhandlingsmøde. Der vil formentlig på forhandlingsmødet være behov for, at vi kan nikke til forligsaftaleteksten med forbehold alene for endelig formel godkendelse og underskrift i DK. Jeg tænker, at der på den baggrund er behov for, at vi mødes i næste uge, således at vi vores myndigheder imellem er helt på linje i forhold til vilkårene i aftalen.

Hvordan ser det ud for jer. Steen og jeg kan begge rokere lidt rundt mandag, tirsdag og onsdag eftermiddag i næste uge?

//Gry (der synes det kunne ha været lirtet at kunne skrive 'elementer' i sted i ovenstående. Teksten kalder ligesom på det.)

Venlig hilsen

Gry Ahlefeld-Engel  
Underdirektør  
Kompleks Svig

+45 72 37 36 62  
Gry.Ahlefeld-Engel@SKTST.DK<mailto:Gry.Ahlefeld-Engel@SKTST.DK>

[cid:image001.jpg@01D4FB62.401A9E00]<www.sktst.dk>

Skattestyrelsen  
Kratbjerg 236, Fredensborg  
www.sktst.dk

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I, the undersigned, Julius Holm Nørremark, certify that I am fluent in both the English and Danish languages and that the preceding text in the English language is to the best of my knowledge and belief a true and faithful translation of the attached exhibit, with the bates stamp SKAT\_MAPLEPOINT\_00000264, in the Danish language.

Copenhagen, 1 April 2025

A handwritten signature in black ink, reading "Julius Holm Nørremark". The signature is written in a cursive, flowing style.

Assistant Attorney, LL.M.